

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
:  
LARA VERA and JEMIRRIA THOMPSON, : Case No. 1:24-cv-02657 (KPF)  
individually and on behalf of all others :  
similarly situated, :  
:  
Plaintiffs, :  
: **NOTICE OF MOTION**  
:  
v. :  
:  
PRIME HYDRATION LLC, :  
:  
Defendant. :  
----- x

PLEASE TAKE NOTICE that, upon the Defendant's accompanying Memorandum of Law in Support of Its Motion to Dismiss the Amended Complaint, the Declaration of Stephen Saxl, dated June 21, 2024, and the exhibit thereto, and all pleadings and proceedings had herein, Defendant Prime Hydration LLC will move this Court, before the Honorable Katherine Polk Failla, United States District Judge, at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, Courtroom 618, New York, New York 10007, at a date and time to be determined by the Court, for an Order, pursuant to Rules 12(b)(1), 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure, dismissing the Amended Complaint in this action with prejudice, and granting Defendant such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
June 21, 2024

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

By: /s/ Stephen L. Saxl  
Stephen L. Saxl  
One Vanderbilt Avenue  
New York, New York 10017  
(212) 801-9200  
(212) 801-6400 (facsimile)  
[saxls@gtlaw.com](mailto:saxls@gtlaw.com)

*Attorneys for Defendant  
Prime Hydration LLC*